

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**LAURA A. SUBER,**

**Plaintiff,**

**v.**

**Civil Action 2:23-cv-2989  
Judge Michael H. Watson  
Magistrate Judge Chelsey M. Vascura**

**RICHARD WOZNIAK, *et al.*,**

**Defendants.**

**PRELIMINARY PRETRIAL ORDER**

The Court conducted a telephonic preliminary pretrial conference on February 20, 2024.

All parties were represented by counsel.

**Rule 26(a)(1) Initial Disclosures**

The parties have agreed to make initial disclosures by **February 16, 2024**.

**Jurisdiction and Venue**

There are no contested issues related to venue or jurisdiction.

**Amendments to Pleadings and/or Joinder of Parties**

Motions or stipulations addressing the parties or pleadings, if any, must be filed no later than **May 31, 2024**.

**Motions**

There are no pending motions.

### **Allegations in the Pleadings and Jury Demand**

This is a case filed by Plaintiff, a police sergeant with the Columbus Division of Police, against the named city officials, city employees, and the investigator alleging discrimination and retaliation based on gender. Plaintiff alleges retaliation after engaging in alleged protected activity based on their participation in the investigation. Plaintiff is seeking compensatory damages, punitive damages, declaratory and injunctive relief, and reasonable attorneys' fees and costs.

There is a jury demand.

### **Expert Disclosures**

Primary expert reports, if any, must be produced by **December 6, 2024**. Rebuttal expert reports, if any, must be produced by **January 7, 2025**.

If an expert is retained or specially employed to provide expert testimony in the case or one whose duties as the party's employee regularly involve giving expert testimony, the witness identification must consist of a report that conforms to Rule 26(a)(2), unless otherwise stipulated or ordered by the Court.

### **Discovery Deadline and Limitations**

The parties may, without further leave of Court, agree to exceed the limitations on discovery established by the Federal Rules of Civil Procedure or the Local Rules of this Court. If the parties are unable to reach an agreement on any matter related to discovery, prior to filing a motion, they are directed to arrange an informal conference with the Court.

All fact discovery shall be completed by **September 3, 2024**. For purposes of complying with this Order, the parties must schedule their discovery in such a way as to require all responses to be served prior to the deadline and must also file any motions relating to discovery within the discovery period.

The parties anticipate the production of ESI.

The parties intend to seek entry of a protective order or clawback agreement.

### **Dispositive Motions**

Case dispositive motions must be filed by **October 18, 2024**. By agreement of the parties, opposition briefs must be filed by **November 6, 2024**, and reply briefs must be filed by **December 6, 2024**.

### **Settlement**

Plaintiff shall make a settlement demand by **May 1, 2024**. Defendants shall respond by **May 15, 2024**. The parties agree to make a good faith effort to settle this case. The parties understand that this case will be referred to an attorney mediator, or to the Magistrate Judge, for a settlement conference in **June 2024**. In order for the conference to be meaningful, the parties agree to complete all discovery that may affect their ability to evaluate this case prior to the settlement conference. The parties understand that they will be expected to comply fully with the settlement order which requires *inter alia* that settlement demands and offers be exchanged prior to the conference and that principals of the parties attend the conference.

Referral to court-facilitated mediation has no effect on the case schedule. All deadlines established in this Order will remain in place unless the parties move for and are granted a continuance or stay. In the event the parties schedule a private mediation, they may notify the Court and request to be excused from participation in court-facilitated mediation.

### **Other Matters**

Any party intending to seek attorney fees and costs as a prevailing party shall make quarterly reports to the other party disclosing the to-date accrued attorney's fees and costs.

If any date set in this Order falls on a Saturday, Sunday, or legal holiday, the date of the next business day will control.

**IT IS SO ORDERED.**

/s/ Chelsey M. Vascura  
CHELSEY M. VASCURA  
UNITED STATES MAGISTRATE JUDGE